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January 12, 2024

Via ECF

Hon. Daniel J. Stewart
U.S. Magistrate Judge
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway
Albany, New York 12207

Re: *Miller-Harris v. The County of Onondaga et al.*, 22-cv-01363-TJM-DJS

Dear Judge Stewart,

We represent the Plaintiffs in the above-captioned action and write to respectfully request an extension on Plaintiff's expert witness disclosure deadline from January 16, 2024 to May 30, 2024, or 45 days after our current fact discovery deadline.

As disclosed by Defendants' counsel in his consent letter to extend the mediation deadline, fact discovery has been delayed and the parties have yet to start depositions (Dkt. No. 54). More specifically, Plaintiff's deposition has not been conducted and both parties are waiting for responses to several pending medical record requests.

For these reasons, Plaintiff would like to complete fact discovery before needing to select and disclose any expert witnesses. As the parties are optimistic that fact discovery will be complete by the current April 15, 2024 deadline, Plaintiff respectfully requests 45 days after the completion of fact discovery to disclose any expert witnesses.

The parties met and conferred regarding the instant request and Defendants' counsel consents to Plaintiff's request for an extension of time on Plaintiff's expert witness disclosure.

We thank the Court for considering this request.

Respectfully,

/s/

Sara Wolkensdorfer